

**University Family Care
NPI Contingency Plan
May 2007**

Documentation of Good Faith Efforts

- Effective 12/23/2006, system programming was in effect to accept both NPI and legacy ID on electronic claims. Effective 5/17/07 system programming was in effect to accept either NPI or legacy ID, or both, on electronic claims. The system was ready to make NPI mandatory for required providers effective 5/23/07, but the system mandatory date has been changed to 1/1/2008 for billing and rendering providers, pending approval of this contingency plan. System changes are in process to require NPI for secondary providers (attending, operating, referring) effective 3/1/2008, pending approval of this contingency plan.
- A summary project plan is attached. A copy of the detailed project plan is available on request.
- University Family Care (UFC) has done extensive outreach to encourage providers to obtain NPIs and report their NPIs to the Arizona Healthcare Cost Containment System Administration (AHCCCSA). This includes provider visits, monthly faxed notifications, check inserts and phone contacts.
- UFC obtains the most recent AHCCCS Provider File each week, and uploads NPIs from the file to the UFC Managed Care System. UFC also stores NPIs received directly from providers in a separate field from the actual NPI, to allow flexibility in deciding to adjudicate claims if the NPI has been reported to UFC, but is not yet in the AHCCCS Provider File.
- Based on Encounter submissions 11/1/2006 through 4/30/2007, 81% of the top 500 submitters have an NPI on file with AHCCCSA. AHCCCSA provided this data to the plan on 5/24/2007.
- UFC has been in production with NPIs with one of our largest trading partners since 2/19/2007. UFC has used Emdeon test claim scenarios to test combinations of NPI and legacy ID in the various provider loops. The testing guidelines are attached.
- UFC has submitted test Encounter files to the AHCCCSA Community Manager website.
- UFC began including available NPIs on the Provider Affiliation Transmission file (PAT) to AHCCCSA effective February 2007.
- Challenges include completing secondary provider programming and Encounter modifications to create AHCCCS Encounters with either an NPI or a legacy ID. The original programming assumed a hard cutoff for requiring the NPI on the Encounter.

Key Resources and Project Roles

Name	Title	NPI Role
Kathy Steiner	Information Systems Manager	Project and EDI Management
Ann Turner	Provider Relations Manager	Provider Outreach
Lisa Frank	Provider Relations Manager	Provider Outreach
John Valentino	Senior Systems Analyst	EDI Development
Julie Conrad	Senior Systems Analyst	EDI Development

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Additional Provider Outreach/Testing Efforts

- UFC will continue provider outreach, including notifications, provider visits and phone contacts, focused on providers who have not submitted their NPIs to AHCCCSA.
- UFC will complete Encounter testing with AHCCCSA.
- UFC will complete system changes to require secondary provider NPIs by 3/1/2008.
- UFC will complete system changes to include the NPI on 835 Remittances.
- UFC is converting to a new Pharmacy Benefit Manager and will test use of NPIs on NCPDP files received.

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- Incoming 837 Claim Transactions
 - Primary (billing, rendering) providers SHOULD use an NPI, if required for their provider type, but UFC will accept submission of both the NPI and/or legacy identifier until 1/1/2008.
 - Secondary (attending, operating, referring) providers SHOULD use an NPI if required for their provider type, but UFC will accept submission of both the NPI and/or legacy identifier until 3/1/2008.
- Outgoing 837 Encounter Transactions
 - UFC will submit Encounters with NPIs effective 1/1/2008 for primary (billing, rendering) providers.
 - UFC will submit Encounters with NPIs effective 3/1/2008 for secondary (attending, operating, referring) providers.
 - UFC will optionally submit NPIs on Encounters prior to 1/1/2008.
- Incoming NCPDP Claim Transactions
 - Pharmacies should use an NPI, but UFC will accept submission of both the NPI and/or legacy identifiers until 1/1/2008.
 - Prescribing providers should use an NPI, but UFC will accept submission of both the NPI and/or legacy identifiers until 3/1/2008.
- Outgoing NCPDP Encounter Transactions
 - UFC will submit NCPDP Encounters with NPIs effective 1/1/2008.
 - UFC will optionally submit NPIs on NCPDP Encounters prior to 1/1/2008.
- Enrollment Inquiry
 - UFC will allow searches by either NPI or legacy AHCCCS ID until 1/1/2008.
- Claims Inquiry
 - UFC will allow searches by either NPI or legacy AHCCCS ID until 1/1/2008.
- Prior Authorization
 - UFC will accept both NPI and legacy identifiers until 1/1/2008.
- Outgoing Provider Affiliation File
 - UFC will submit NPIs, when available, prior to 1/1/2008, and only NPIs as of 1/1/2008 on the Provider Affiliation File.

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Timeline

Completion of Encounter Testing with AHCCCSA - **10/1/2007**

Required Compliance Date for Primary (Billing/Rendering) Providers – **1/1/2008**

Required Compliance Date for Secondary (Referring, Attending, Operating, Prescribing)
Providers - **3/1/2008**